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19 IN THE UNITED STATES DISTRICT COURT
20 FOR THE NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION
22

23 TELESOCIAL INC.,
24 Plaintiff,
25 v.
26 ORANGE S.A., *et al.*,
27 Defendants.
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Case No. 3:14-cv-03985-JD

**AMENDED JOINT [PROPOSED]
STATEMENT OF THE CASE**

Ctrm: 11, 19th Floor
Judge: Honorable James Donato

1 Pursuant to Paragraph V.1 of the Final Pretrial Order, the following is the Parties' Joint
2 Proposed Statement of the Case:

3 The parties in this case are Plaintiff Telesocial Inc., which may be referred to as Plaintiff or
4 "Telesocial," Defendant Orange S.A., which may be referred to as "Orange," and the following
5 individual defendants: Anne Benrikhi, Olivier Godiniaux, Guillaume Guimond, and Benoit Amet.
6 We may collectively refer to all of the individual defendants as the "Individual Defendants," and
7 to all of the Individual Defendants together with Orange as the "Defendants." Telesocial is a
8 technology start-up company based in the Bay Area. Orange, formerly known as France Telecom,
9 is a telecommunications company based in France with operations throughout the world. The
10 individuals are current or former employees at Orange.

11 Telesocial alleges that Orange hacked Telesocial's computer servers and misused
12 Telesocial's confidential, trade secret information to create a product that Orange would use in a
13 venture with Facebook. Telesocial asserts claims against Orange and the Individual Defendants
14 for violations of the Computer Fraud and Abuse Act, violations of the California Comprehensive
15 Computer Data Access and Fraud Act, and misappropriation of Telesocial's trade
16 secrets. Telesocial seeks money damages and punitive damages for these claims. Telesocial also
17 asserts claims against Orange for breach of contract and breach of the implied covenant of good
18 faith and fair dealing. Telesocial seeks money damages for these claims. Defendants deny
19 Telesocial's claims and deny that Telesocial is entitled to any damages.

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22 Respectfully submitted,
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1 TELESOCIAL, INC.

ORANGE, S.A., et al.

2 By its attorneys,

By their attorneys,

3 /s/ Todd M. Briggs

/s/ Anthony D. Mirenda

Todd M. Briggs

Anthony D. Mirenda

4 QUINN EMANUEL URQUHART &
SULLIVAN, LLP

FOLEY HOAG LLP

5 Dated: March 30, 2017

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